
IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:)	Case No.: 17-18676
Clifford E Keller and)	
Mary A Szerzen-Keller)	Chapter 7
)	
Debtor(s).)	Judge Carol A. Doyle

NOTICE OF MOTION & SHORTEN NOTICE

To: The Honorable Judge Carol A. Doyle *Via Electronic Filing*
U.S. Trustee Patrick S Layng *Via Electronic Filing*
Fox, Swibel, Levin & Carroll, LLP, Trustee N. Neville Reid 200 W. Madison Street
Suite 3000 Chicago, IL 60606 *Via Electronic Filing*
Trustee Tom Vaughn *Via Electronic Filing*
Clifford E Keller and Mary A Szerzen-Keller, 697 Weymouth Circle Hanover Park, IL
60133 *via US Mail*
Ocwen Loan Servicing, LLC, Attn: Research/Bankruptcy, 1661 Worthington Rd Ste 100,
West Palm Beach, FL 33409 *via US Mail*
Codilis & Associates, P.C., Brenda Ann Likavec, 15W030 N. Frontage Road
Suite 100, Burr Ridge, IL 60527 *via US Mail*
Olde Salem Homeowners Association, 7700 Olde Salem Rd, Hanover Park, IL 60133
via US Mail
Kovitz Shifrin Nesbit, Ronald J. Kapustka, 175 N. Archer Avenue, Mundelein, IL 60060
via US Mail
See attached service list

PLEASE TAKE NOTICE that on December 18, 2019 at 10:00 am, or as soon thereafter as I may be heard, I shall appear before the Honorable Judge Carol A. Doyle or any other Bankruptcy Judge presiding at 219 South Dearborn, Courtroom 742, Chicago, Illinois 60604, and present the attached Motion to Authorize Short Sale and on Shortened notice, and shall request that the attached Order be entered, at which time you may appear if so desired.

/s/ David H. Cutler
David H. Cutler, ESQ
Cutler & Associates Ltd.
4131 Main Street
Skokie IL 60076
(847) 673-8600

CERTIFICATE OF SERVICE

The undersigned, an Attorney, does hereby certify that a copy of this Notice and Motion was filed AND sent electronically and via US MAIL to the above captioned by 6:00 p.m. on or before December 11, 2019.

/s/ David H. Cutler
David H. Cutler, ESQ

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MOTION TO AUTHORIZE SHORT SALE & SHORTEN NOTICE

NOW COME the Debtors, Clifford E Keller and Mary A Szerzen-Keller (hereinafter referred to as “DEBTORS”), by and through their attorneys, Cutler and Associates, Ltd., and move this Honorable Court for entry of an Order Authorizing the Short Sale Agreement the Debtors have entered into with a third-party buyer, and in support thereof, respectfully represents as follows:

1. On June 20, 2017, the Debtors filed a petition for relief under Chapter 13 of the Bankruptcy Code.
2. That on, October 8, 2019 a notice to convert the Debtors case to a Chapter 7 Bankruptcy was filed.
3. That on November 13, 2019, the Chapter 7 Trustee's Report of No Distribution was entered.
4. That the Debtors have been granted short sale approval. (See attached Exhibit A)
5. The Debtors would like to accept an offer to short-sale their real property located at 697 Weymouth Circle, Hanover Park, IL 60133. (See attached Exhibit B)
6. That the Debtors real property is encumbered by a mortgage with Ocwen Loan Servicing, LLC servicer for Deutsche Bank National Trust Company.

7. That when the Chapter 13 case was filed, the Debtors real estate property was encumbered with a mortgage loan in the approximate amount of, \$138404.84 with Ocwen Loan Servicing, LLC servicer for Deutsche Bank National Trust Company.
8. That the Debtors has a benefit to short sale this property and that the Automatic Stay has not yet lifted.
9. That the Debtors will be receiving \$3000.00 in relocation funds at time of closing.
10. That the Debtors will face irreparable harm and as such bring this motion on short notice, that the dates for this motion to be heard before the end of the year are limited and the Debtors must close before the end of the year or face losing their short sale approval and contract thus costing them the ability to short sale their property.
11. Therefore, the Debtors request that this Honorable Court allow them to enter into this short-sale agreement on shortened notice.

WHEREFORE, Debtors respectfully pray that this Court enter an order granting them authority to enter in the short-sale agreement for their property on shortened notice, and for such other and further relief this court deems just and equitable.

/s/ David H. Cutler
David H. Cutler, ESQ
Attorney for Debtor(s)
Cutler & Associates Ltd.
4131 Main Street
Skokie IL 60076
(847) 673-8600